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9 UNITED STATES BANKRUPTCY COURT
 10 NORTHISN DISTRICT OF CALIFORNIA, SAN FRANCISCO DIVISION
 11

12 In re

13 PG&E Corporation,

14 and

15 PACIFIC GAS AND ELECTRIC
 16 COMPANY,

17 Debtors.

18 ☐ Affects PG&E Corporation
 19 ☐ Affects Pacific Gas and Electric Company
 20 ☒ Affects both Debtors

21 *All papers shall be filed in the Lead Case,
 22 No. 19-30088-DM,

Case No. 19-30088-DM

Chapter 11
 Lead Case, Jointly Administered

**MOTION FOR RELIEF FROM
 AUTOMATIC STAY TO PERMIT THE
 COURTS OF THE STATE OF
 CALIFORNIA TO CONDUCT A JURY
 TRIAL AND RELATED PRETRIAL AND
 POST TRIAL MATTERS IN
 CONNECTION WITH CREDITOR, JOHN
 LEE CLARK'S COMPLAINT FOR
 DAMAGES, OR IN ALTERNATIVE, FOR
 ABSTENTION**

Date: July 7, 2020
 Time: 10:00 a.m.
 Place: Courtroom 17450 Golden Gate
 Avenue, 16th Floor
 San Francisco, CA
 Judge: Hon. Dennis Montali

Objection Deadline: July 2, 2020, 4:00 p.m.
 Pacific Standard Time

23 Creditor, John Lee Clark ("Mr. Clark") hereby respectfully submits this Motion for Relief
 24 from the Automatic Stay to Permit the Courts of the State of California to Conduct a Jury Trial
 25 and Related Pretrial and Post Trial Matters in Connection with Creditor, John Lee Clark's
 26 Complaint for Damages, or in Alternative, for Abstention (the "Motion") pursuant to 11 U.S.C.
 27 Section 362(d), for cause, or in the alternative for abstention pursuant to 28 U.S.C. Section
 28

1 1334(c)(1).

2 This Motion seeks the entry of an order granting relief from the automatic stay to allow
3 Mr. Clark to prosecute his Complaint for Damages filed with the Superior Court of the State of
4 California, in and for the County of San Francisco, on July 10, 2018, which includes causes of
5 action for: negligence, premises liability, public nuisance, inverse condemnation, trespass, and
6 private nuisance claims against PG&E Corporation and Pacific Gas and Electric Company
7 (collectively the "Debtors"), arising from the explosion and fire that occurred on January 12, 2017,
8 at real property located on 2209 South George Washington Boulevard, Yuba City, California. The
9 Complaint alleges that the Explosion was caused due to the Debtors' endemic failure to maintain
10 certain gas distribution lines and resulted in catastrophic injuries and loss of real and personal
11 property of Mr. Clark.

12 This Motion seeks an order to allow Mr. Clark to proceed against the Debtors, in order to
13 establish the liability of the Debtors, obtain judgment(s) against the Debtors, and collect any
14 judgment(s) obtained against the Debtors from the Debtors and/or their insurers, as applicable. In
15 the alternative, Mr. Clark respectfully requests the Court to abstain from deciding the validity and
16 amount of his claims against the Debtors, in favor of the Courts of the State of California.

17 DATED: June 15, 2020

DOWNEY BRAND LLP

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19 By: /s/ Jamie P. Dreher
20 JAMIE P. DREHER
21 Attorneys for John Lee Clark
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